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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION**

SleekEZ, LLC,)	
)	Civil No. 16-CV-9-BLG-SPW-CSO
Plaintiff,)	
vs.)	
Hal Horton d/b/a Groom Ninja; and John)	<u>JOINT STATEMENT OF</u>
Does 1-20,)	<u>STIPULATED FACTS</u>
Defendants.)	
)	
)	

Pursuant to D. Mont. L.R. 16.2(b)(3) and this Court's order, Plaintiff SleekEZ, LLC ("SleekEZ") submits the following stipulated facts to which all parties agree.

JURISDICTION AND VENUE

1. SleekEZ is a Wyoming limited liability company that has its principal place of business in Billings, Montana. Defendant Hal Horton d/b/a Groom Ninja (“Mr. Horton”) is a citizen and resident of California. There is complete diversity of citizenship.

2. Venue is proper in the District of Montana, Billings Division.

GENERAL ALLEGATIONS

3. SleekEZ is a business owned by Jennifer Tipton.

4. SleekEZ develops, markets, and sells custom-manufactured grooming tools for horses and other animals.

5. Mr. Horton had a relationship with Ms. Tipton, owner of SleekEZ, from 2002 until 2014.

6. Sometime after 2012, Mr. Horton worked on sales and marketing for SleekEZ.

7. SleekEZ compensated Mr. Horton for his sales work. It is disputed whether Mr. Horton was fully or partially compensated.

8. Mr. Horton’s relationship with SleekEZ terminated sometime in 2014.

9. Mr. Horton has worked with others to market, manufacture, and sell his products and fulfill his orders.

DATED this 17th day of May, 2016.

Respectfully submitted,

CROWLEY FLECK PLLP

By /s/ SHALISE C. ZOBELL
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Attorneys for Hal Horton d/b/a
Groom Ninja

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served upon the following counsel of record, by the means designated below, this 17th day of May, 2016:

[] U.S. Mail	Eric Edward Nord
[] FedEx	Crist, Krogh & Nord, PLLC
[] Hand-Delivery	The Securities Building
[] Facsimile	2708 First Avenue North, Suite 300
[] Email	Billings, MT 59101
<input checked="" type="checkbox"/> ECF Electronic filing	

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